

## HICKS THOMAS LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

2300 TC ENERGY CENTER  
700 LOUISIANA STREET  
HOUSTON, TEXAS 77002

CRYSTAL V. VENNING  
713.547.9196

TELEPHONE: 713.547.9100  
FACSIMILE: 713.547.9150

E-MAIL ADDRESS  
CVENNING@HICKS-THOMAS.COM

November 23, 2022

### VIA ECF

The Honorable Frederic Block  
Senior United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Case No. 2:22-cv-01305-FB-ST  
*Mahoney v. U.S. Department of Interior*


Dear Judge Block:

The undersigned represents the Plaintiffs in the above-referenced matter. The U.S. Department of the Interior, Bureau of Ocean Energy Management, the U.S. Department of the Army and the U.S. Army Corps of Engineers (collectively “Federal Defendants”) have sought oral argument on their Rule 12(b) Motion to Dismiss the Complaint (the “12(b) Motion”). *See* Dkt. No. 83. Likewise, Defendant-Intervenor, South Fork Wind, LLC has sought oral argument on its Motion for Judgment on the Pleadings (the “12(c) Motion” and together with the 12(b) Motion, the “Related Motions”). *See* Dkt. No. 76.

I write on behalf of Plaintiffs to join in the respective requests for oral argument of the Federal Defendants and Defendant-Intervenor on the Related Motions and submit that argument would aid the Court in deciding the complex issues of law and fact raised by the Related Motions and Plaintiff’s Opposition thereto.

Thank you for your consideration.

Cordially,  
HICKS THOMAS LLP



Crystal V. Venning  
Hicks Thomas LLP

cc: All counsel via ECF